

**County of Montgomery
State of Alabama**

Affidavit of Roy Stewart Moore

I, Roy Stewart Moore, am over the age of eighteen, of sound mind and body, and duly competent to testify, hereby swear and affirm as follows:

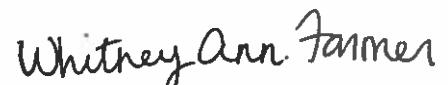
1. Based upon the facts and the allegations set out in the accompanying motion, it appears that Judge John P. Cronan has shown an extrajudicial bias and prejudice towards me in this case, and that his recusal is necessary under 28 USC § 144.
2. Judge Carter, who was initially assigned to this case, after arguments by both sides, allowed full discovery with regard to fraud and the standard consent agreement, as well as discovery on the First Amendment. Nevertheless, once this case was transferred to Judge Cronan, Judge Cronan ignored Judge Carter's rulings, which might be considered law of the case, and strictly limited the discovery so narrowly as to apply only to matters regarding corporate structure.
3. During hearings on these matters, Judge Cronan seemed to advocate on behalf of the Defendant Sacha Baron Cohen, choosing to allow the deposition of Cohen to be designated "confidential" so as to protect the celebrated actor who had himself chosen to embarrass me before the entire Country after inviting me and my wife through his fellow associates to travel to Washington D. C. to receive an award for my support for the Nation of Israel.
4. Not only did Judge Cronan appear rude and disrespectful to my attorney, but he also seemed to apologize to the Defendant's counsel for not giving them all the relief they were seeking.
5. It appeared to me that Judge Cronan was simply disposed to ignore my modification of the consent agreement and to misinterpret the *Psenicska v. Twentieth Century Fox Film Corp.* 2008 U.S. Dist. case, while suggesting that Judge Preska, who authored the *Psenicska* decision, had

written another case cited by defendants which could be dispositive of this case. Transcript of December 3, 2020 proceeding, ECFN096 at 41:13-19.

6. Finally, after severely limiting our discovery only to the corporate structure and ignoring the egregious fraud committed by the Defendant against me and my wife, Judge Cronan had the audacity to tell my attorney that, "I urge you to carefully consider whether your time and your clients time is best spent deposing someone who may not have much, if anything to add, particularly here where the defendants have made available two witnesses, Mr. Schulman and Ms. Wallace who seem to have far more direct knowledge." I have no knowledge that either Schulman or Wallace had been involved in the fraudulent transaction which the Defendants perpetrated.
7. Judge Cronan's efforts to dispose of this case by severe limitations on discovery, which had been allowed by Judge Carter, and to ignore the fraudulent conduct of the Defendant, combined with his remarks to my counsel that we should consider whether we would be wasting our time seeking further discovery, is demonstrable evidence of his bias and prejudice in this case.
8. I am endorsing and incorporating by reference in this affidavit the factual and legal arguments of my counsel Larry Klayman contained in the accompanying motion, to which my affidavit herein is an integral and material part.
9. I respectfully request that Judge Cronan recuse from this case.

Further Affiant Sayeth Not,

Roy S. Moore



My Commission Expires 10-26-2024

